

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FREDRIC A. GUENTHER, an
individual; WALTON
FUJIMOTO, an individual, and
LESLIE OWEN, an individual,

Plaintiffs

v.

BP RETIREMENT
ACCUMULATION PLAN, by its
Plan Administrator, the Senior Vice
President of Human Resources of BP
CORPORATION NORTH
AMERICA INC.; and BP
CORPORATION NORTH
AMERICA INC., a corporation,

Defendants.

Civil Action No. 4:16-CV-995

DEFENDANTS' ADMITTED TRIAL EXHIBITS

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
6	Letter from James Ross and Long Brochure (Def. MSJ Ex. 18) (Dep. Ex. 6) (GUE 001299 - GUE 001325)	Pre-admitted
7	B. Cohn Opening Account Balance statement (Dep. Ex. 7) (BP_0012098 - BP_0012099)	Pre-admitted
8	1989 Laird letter and RAP brochure (Dep. Ex. 8) (GUE 002540 - GUE 002565)	Pre-admitted
9	2011 Dorazil Letter to SOHIO heritage employees (Dep. Ex. 9) (GUE 000093 - GUE 000094)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
15	1988 ARP SPD (Dep. Ex. 15) (BP_0003568 - BP_0003599)	Pre-admitted
17	1998 RAP SPD (Dep. Ex. 17) (BP_0003670 - BP_0003691)	Pre-admitted
19	1991 RAP SPD (Dep. Ex. 19) (BP_0003625 - BP_0003647)	Pre-admitted
20	RAP Major Features Presentation (Dep. Ex. 20) (GUE 000708 - GUE 000729)	Pre-admitted
24	Grdina Opening Account Balance Letter (Dep. Ex. 24) (BP_0012484 - BP_0012485)	Pre-admitted
26	Summary of RAP Benefits for Grdina (Dep. Ex. 26) (BP_0012496 - BP_0012500)	Pre-admitted
30	Welcome message posted by Guenther to Yahoo! Heritage Sohio Employees Group (Def. MSJ Ex. 13(K)) (Dep. Ex. 30)	Pre-admitted
31	Yahoo Group Description (Def. MSJ Ex. 19) (Dep. Ex. 31)	Pre-admitted
32	Email correspondence between F. Guenther and R. Dorazil (Def. MSJ Ex. 20) (Dep. Ex. 32) (BP-0020345-BP_0020346)	Pre-admitted
33	Email from Russel Stauffer to colleagues (Def. MSJ Ex. 21) (Dep. Ex. 33) (BP_0020041 - BP_0020042)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
34	Email From Guenther requesting plan info for Union (Dep. Ex. 34) (BP_0020349 - BP_0020352)	6/27/23
35	Email re Union requesting RAP balance info (Dep. Ex. 35) (BP_0019840 - BP_0019841)	Pre-admitted
36	Email from Guenther to York (Def. MSJ Ex. 13(U)) (Dep. Ex. 36) (BP_0019843 - BP_0019847)	Pre-admitted
38	GN Nelson Cover letter to RAP rollout (Dep. Ex. 38) (GUE 000238)	Pre-admitted
39	Guenther Opening Account Balance Letter (Def. MSJ Ex. 22) (Dep. Ex. 39) (GUE 001814 - GUE 001817)	Pre-admitted
40	Guenther Account Statements (Dep. Ex. 40) (GUE 002244 - GUE 002341)	6/27/23
41	2018 Pension Benefit Modeling Statement for Guenther (Dep. Ex. 41) (GUE 002705 - GUE 002720)	Pre-admitted
42	Guenther FidelityNet Pension Estimates (Dep. Ex. 42) (BP_0019916 - BP_0019918)	6/27/23
43	BP Retirement Service Calculation Letter to Guenther (Dep. Ex. 43) (BP_0019923 - BP_0019924)	Pre-admitted
44	Guenther claim for benefits (Def. MSJ Ex. 23) (Dep. Ex. 44) (GUE 000001 - GUE 000008)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
45	Guenther Appeal Letter (Dep. Ex. 45) (GUE 002343 - GUE 002359)	Pre-admitted
46	Guenther Appeal Denial Letter (Dep. Ex. 46) (GUE 002391 - GUE 002407)	Pre-admitted
57	Cigna retirement lawsuit message to Yahoo Group (Dep. Ex. 57)	Pre-admitted
59	Correspondence between Weiss and Guenther re Sohio Pension Issues (Dep. Ex. 59) (BP_0020181 - BP_0020182)	Pre-admitted
60	Guenther sending 1989 Ross letter to Weiss (Dep. Ex. 60)	Pre-admitted
61	Guenther comment posted in Reuters - from Yahoo Group (Dep. Ex. 61)	Pre-admitted
68	Attorney correspondence re Fujimoto release (Dep. Ex. 68) (GUE 002635 - GUE 002643)	Pre-admitted
71	Fujimoto Settlement Checks (Dep. Ex. 71) (BP_0024087 - BP_0024089)	Pre-admitted
77	Fujimoto opening account balance letter (Dep. Ex. 77) (BP_0019941 - BP_0019945)	Pre-admitted
78	Fujimoto historical account statements (Dep. Ex. 78) (BP_0020028 - BP_0020028)	6/21/23
79	Fujimoto YE 2000 Account statement (Dep. Ex. 79) (BP_0025959)	6/21/23
84	Email summary of Sohio Issue from Guenther (Dep. Ex. 84)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
85	Fujimoto Pension Election Authorization (Dep. Ex. 85) (BP_0019932 - BP_0019940)	Pre-admitted
86	Fujimoto distribution check (Dep. Ex. 86) (GUE 002667 - GUE 002669)	Pre-admitted
101	First communication from Office of Ombudsman (Def. MSJ Ex. 28) (Dep. Ex. 101) (OoO 4971 - OoO 4972)	Pre-admitted
112	OoO update #2 (Dep. Ex. 112) (OoO 4969 - OoO 4970)	Pre-admitted
116	OoO update #3 (Dep. Ex. 116) (OoO 4968)	Pre-admitted
118	Guenther req for update from OoO (Dep. Ex. 118) (OoO 02349 - OoO 02350)	Pre-admitted
119	OoO update #4 (Dep. Ex. 119) (OoO 4967)	Pre-admitted
134	OoO update #6 (Dep. Ex. 134) (OoO 4964)	Pre-admitted
135	OoO update #7 (Dep. Ex. 135) (OoO 4963)	Pre-admitted
136	OoO update #8, Guenther req firm date for BP resp (Dep. Ex. 136) (OoO 5885)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
145	Minge Message (Def. MSJ Ex. 30) (Dep. Ex. 145) (OoO 02399)	Pre-admitted
169	Minge ltr re BP resp to OoO recomm (Dep. Ex. 169) (GUE 000096 - GUE 000097)	Pre-admitted
170	KL briefing - cash balance plan (Dep. Ex. 170) (BP_0028339 - BP_0028369)	Pre-admitted
174	KL Uniform Salaried Pension Plan Study March 1988 (Dep. Ex. 174) (BP_0027920 - BP_0027923)	Pre-admitted
175	KL Uniform Salaried Pension Plan Study Apr 1988 (Dep. Ex. 175) (BP_0027918 - BP_0027919)	Pre-admitted
176	KL Analyses (Dep. Ex. 176) (BP_0027913 - BP_0027917)	Pre-admitted
177	KL Comparison of Pension Benefits (Dep. Ex. 177) (BP_0027545)	Pre-admitted
178	KL - Account Balance Pension Plan Implementation Timetable (Dep. Ex. 178) (BP_0027014 - BP_0027016)	6/22/23
179	KL - Effect of Transition to New Plan for Current EEs (Dep. Ex. 179) (BP_0027666 - BP_0027668)	6/22/23
180	Proposed Acct Balance – Mgt Briefing July 1988 (Dep. Ex. 180) (BP_0026878 - BP_0026889)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
181	KL Acct Bal Plan Calcs Aug 1988 (Dep. Ex. 181) (BP_0027662 - BP_0027665)	Pre-admitted
182	KL - details of proposed Account Bal formula (Dep. Ex. 182) (BP_0027657 - BP_0027661)	Pre-admitted
183	Letter from Kwasha Lipton to E. Rossman (Def. MSJ Ex. 33) (Dep. Ex. 183) (BP_0027633 - BP_0027648)	Pre-admitted
184	KL - Revised Acct Bal Acct formula (Dep. Ex. 184) (BP_0027596 - BP_0027602)	Pre-admitted
185	KL - Lump Sum Value of Benefits at Term (Dep. Ex. 185) (BP_0027631 - BP_0027632)	Pre-admitted
186	Illustration of Benefits Due upon Retirement (Dep. Ex. 186) (BP_0027626 - BP_0027630)	Pre-admitted
187	KL Misc slides (Dep. Ex. 187) (BP_0027603 - BP_0027616)	Pre-admitted
188	KL - Estimated Value of Projected Benefits (Dep. Ex. 188) (BP_0027049 - BP_0027050)	Pre-admitted
190	KL - Ltr to Rossman - communications project (Dep. Ex. 190) (BP_0026847 - BP_0026852)	Pre-admitted
191	KL - Results of Nov 10 1988 Acct Plan Implementation Mtg (Dep. Ex. 191) (BP_0028017 - BP_0028020)	Pre-admitted
192	BP Memo re Nov 21 Account Balance Mtg scheduled (Dep. Ex. 192) (BP_0026853 - BP_0026866)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
193	KL - Ltr to Rossman - 1st draft ltr from mgt plan intro (Dep. Ex. 193) (BP_0026759 - BP_0026763)	Pre-admitted
194	KL - Ltr to Rossman - 2nd draft ltr from mgt plan intro (Dep. Ex. 194) (BP_0028466 - BP_0028446)	Pre-admitted
195	RAP Highlights Brochure – short version (Dep. Ex. 195) (BP_0028458 - BP_0028465)	Pre-admitted
196	RAP Highlights Brochure – long version (Dep. Ex. 196) (BP_0028447 - BP_0028457)	Pre-admitted
197	ltr to employee re new plan – draft #1 (Dep. Ex. 197) (BP_0027456 - BP_0027457)	Pre-admitted
200	RAP meeting slides (Dep. Ex. 200) (BP_0026344 - BP_0026365)	Pre-admitted
204	Letter from Kwasha Lipton to E. Rossman (Def. MSJ Ex. 34) (Dep. Ex. 204) (BP_0028478)	Pre-admitted
205	Sixth draft of Long Brochure (Def. MSJ Ex. 35) (Dep. Ex. 205) (BP_0028648 - BP_0028692)	Pre-admitted
206	Thirteenth draft of Short Brochure (Def. MSJ Ex. 36) (Dep. Ex. 206) (BP_0026452 - BP_0026456)	Pre-admitted
207	RAP Detailed Brochure –draft (Dep. Ex. 207) (BP_0026367 - BP_0026390)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
208	Communication Elements – EE mtgs (Dep. Ex. 208) (BP_0026391)	Pre-admitted
211	KL - Memo re Increasing Annuity Payment Form in RAP (Dep. Ex. 211)	Pre-admitted
215	KL Dec. 2 1987 meeting notes (Dep. Ex. 215) (BP_0028370 - BP_0028372)	Pre-admitted
216	Pension Plan Consolidation Project letter (Dep. Ex. 216) (BP_0026665 - BP_0026669)	Pre-admitted
217	Memo to CEO committee re RAP (Dep. Ex. 217) (BP_0027425 - BP_0027433)	Pre-admitted
218	Memo to Herbert re plan modifications (Dep. Ex. 218) (BP_0027434)	Pre-admitted
219	Memo from Paul McAuliffe to J.L. Pearce (Def. MSJ Ex. 37) (Dep. Ex. 219) (BP_0027051 - BP_0027061)	Pre-admitted
220	Memo to CEO committee re proposed pension plan (Dep. Ex. 220) (BP_0026890 - BP_0028224)	Pre-admitted
221	Memo re Discount Option for Early Payout (Dep. Ex. 221) (BP_0027617 - BP_0027618)	Pre-admitted
222	Memo from Paul McAuliffe (Def. MSJ Ex. 38) (Dep. Ex. 222) (BP_0028414 - BP_0028322)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
223	Memo to Herbert re revisions in certain plan endorsed by Ross (Dep. Ex. 223) (BP_0030583 - BP_0030584)	Pre-admitted
224	Ltr to Ross re poss of curbing rate of growth in late career (Dep. Ex. 224) (BP_0027560 - BP_0027564)	Pre-admitted
225	Memo re adoption of RAP (Dep. Ex. 225) (BP_0026527 - BP_0026528)	Pre-admitted
226	Memo from D. L. Babinchak to P. McAuliffe re BP Retirement Programs (Dep. Ex. 226) (BP_0027542 - BP_0027544)	6/26/23
227	Memo re pension plan funding policy (Dep. Ex. 227) (BP_0027556 - BP_0027558)	Pre-admitted
228	Memo re Account Plan Implementation Meeting (Dep. Ex. 228) (BP_0028017 - BP_0028020)	Pre-admitted
229	RAP slides (Dep. Ex. 229) (BP_0028373 - BP_0028385)	Pre-admitted
230	1988.05.12 meeting notes (Dep. Ex. 230) (BP_0027546 - BP_0027555)	Pre-admitted
231	Adoption of Acct Balance Pension Plan document (Dep. Ex. 231) (BP_0027513 - BP_0027525)	Pre-admitted
232	RAP Major Features (Dep. Ex. 232)	Pre-admitted
233	ltr to S. Harp re RAP and communications to ees (Dep. Ex. 233) (BP_0028023 - BP_0028026)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
234	Strategies for Conducting Successful Meetings (Def. MSJ Ex. 40) (Dep. Ex. 234) (BP_0026706 - BP_0026718)	Pre-admitted
236	In Person Meeting Materials, including Presentation Slides and Script (Def. MSJ Ex. 41) (Dep. Ex. 236) (BP_0026926 - BP_0026995)	Pre-admitted
237	Communications Objectives and Elements (Def. MSJ Ex. 42) (Dep. Ex. 237)	Pre-admitted
238	RAP Plan Highlights (Dep. Ex. 238) (BP_0027844 - BP_0027873)	Pre-admitted
239	RAP Major Features (Dep. Ex. 239) (BP_0028252 - BP_0028288)	Pre-admitted
240	RAP Major Features –Draft (Dep. Ex. 240) (BP_0028581 - BP_0028612)	Pre-admitted
241	FAQ and Answers (Def. MSJ Ex. 43) (Dep. Ex. 241) (BP_0027874 - BP_0027886)	Pre-admitted
242	1990 Interest Rate Credit Announcement (Def. MSJ Ex. 44) (Dep. Ex. 242) (BP_0027257)	6/22/23

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
243	1991 Regular Interest Rate Credit Announcement (Def. MSJ Ex. 45) (Dep. Ex. 243) (BP_0027249)	6/22/23
244	1994 Regular Interest Rate Credit Announcement (Def. MSJ Ex. 46) (Dep. Ex. 244) (BP_0027239)	6/22/23
247	Short Brochure (Def. MSJ Ex. 47) (Dep. Ex. 247) (BP_0027990 - BP_0027997)	Pre-admitted
256	Ross Letter & Short Brochure (Dep. Ex. 256) (GUE_001299 & GUE_0027990 - GUE_0027997)	Pre-admitted
257	Long Brochure (Dep. Ex 257) (GUE 001300 - GUE 001325)	Pre-admitted
259	Owens Statement showing Activity for 1989 (Dep. Ex 259) (GUE 014303 - GUE 014304)	6/21/23
260	Owen Account Statement Early 1991 (Dep. Ex 260) (GUE 014307 - GUE 014308)	6/21/23
261	Owen Account Statement First Half of 1991 (Dep. Ex 261) (GUE 014279)	6/21/23
262	Owen Account Statement Ending 12-31-1991 (Dep. Ex 262) (GUE 014280)	6/21/23

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
263	Owen Account Statement Ending 12-31-1992 (Dep. Ex 263) (GUE 014281)	6/21/23
264	Owen Account Statement Ending 12-31-1993 (Dep. Ex 264) (GUE 014282)	6/21/23
265	Owen Account Statement Ending 12-31-1994 (Dep. Ex 265) (GUE 014283)	6/21/23
266	Owen Account Statement Ending 12-31-1995 (Dep. Ex 266) (GUE 014284)	6/21/23
267	Owen Account Statement Ending 12-31-1996 (Dep. Ex 267) (GUE 014285)	6/21/23
268	Owen Account Statement Ending 12-31-1997 (Dep. Ex 268) (GUE 014286)	6/21/23
270	Owen Account Statement Ending 12-31-1998 (Dep. Ex 270) (GUE 014287)	6/21/23
298	2015 RAP Plan document - as of January 1, 2015 (Dep. Ex 298) (BP_0002848 - BP_0002951)	Pre-admitted
900	email correspondence between F. Guenther and R. Dorazil (Def. MSJ Ex. 13(A)) (BP_0025569 - BP_0025570)	6/27/23
901	Guenther email to Minge (Def. MSJ Ex. 13(B)) (BP_0019887– BP_0019888)	Pre-admitted
905	Email and attachments from Guenther to Minge (Def. MSJ Ex. 13(F)) (BP_0024848 - BP_0024850)	6/27/23

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
911	Copy of “25998_Heritage Pension Flyer” posted by Guenther to Yahoo! Heritage Sohio Employees Group “Files” page (Def. MSJ Ex. 13(O))	7/17/23
917	Email from Guenther to Marc Kovac, Kristjan Dye, Mike W. Elson, Mike D. Moma, and Jeanne Stewart (Def. MSJ Ex. 13(V)) (GUE 004879)	6/27/23
922	Confidential Settlement Agreement and Release of Claims executed by W. Fujimoto (Def. MSJ Ex. 14(E)) (BP-0024090-BP-0024095)	Pre-admitted
923	1988 BP Amer. Retirement Plan document (Def. MSJ Ex. 15(A)) (BP_0000001 –0000084)	Pre-admitted
925	1988 ARP Summary Plan Description (Def. MSJ Ex. 15(B)) (BP_0003568)	Pre-admitted
927	1989 BP Retirement Accumulation Plan (“RAP”) (Def. MSJ Ex. 15(C)) (BP_0000085 - BP_0000187)	Pre-admitted
929	RAP plan document (Def. MSJ Ex. 15(D)) (BP_0000188 - BP_0000410)	7/17/23
930	RAP plan document (Def. MSJ Ex. 15(E)) (BP_0000411 - BP_0001044)	7/17/23
931	RAP plan document (Def. MSJ Ex. 15(F)) (BP_0001045 - BP_0001253)	7/17/23
932	RAP plan document (Def. MSJ Ex. 15(G)) (BP_0001254 - BP_0001603)	7/13/23

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
933	RAP plan document (Def. MSJ Ex. 15(H)) (BP_0001604 - BP_0001956)	7/18/23
934	RAP plan document (Def. MSJ Ex. 15(I)) (BP_0001957 - BP_0002387)	7/18/23
935	RAP plan document (Def. MSJ Ex. 15(J)) (BP_0002388 - BP_0002844)	7/18/23
936	RAP plan document (Def. MSJ Ex. 15(K)) (BP_0002845 - BP_0003413)	7/18/23
937	RAP SPD (Def. MSJ Ex. 15(L)) (BP_0003625 - BP_0003647)	Pre-admitted
939	RAP SPD (Def. MSJ Ex. 15(N)) (BP_0003670 - BP_0003691)	Pre-admitted
940	RAP SPD (Def. MSJ Ex. 15(O)) (BP_0003692 - BP_0003738)	7/13/23
944	RAP SPD (Def. MSJ Ex. 15(S)) (BP_0003877 - BP_0003943)	Pre-admitted
945	RAP SPD (Def. MSJ Ex. 15(T)) (BP_0003944 - BP_0004020)	Pre-admitted
946	RAP SPD (Def. MSJ Ex. 15(U)) (BP_0004021 - BP_0004097)	Pre-admitted
947	RAP SPD (Def. MSJ Ex. 15(V)) (BP_0004098 - BP_0004170)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
948	RAP SPD (Def. MSJ Ex. 15(W)) (BP_0004171 - BP_0004245)	Pre-admitted
949	RAP SPD (Def. MSJ Ex. 15(X)) (BP_0004246 - BP_0004320)	Pre-admitted
950	RAP SPD (Def. MSJ Ex. 15(Y)) (BP_0004321 - BP_0004396)	Pre-admitted
951	RAP SPD (Def. MSJ Ex. 15(Z)) (BP_0004397 - BP_0004472)	Pre-admitted
958	Guenther email to DOL (Def. MSJ Ex. 53(G)) (GUE 004060)	6/27/23
965	Email re: More Problems at BP - contact investigative reporter (Guenther RFA Ex. H) (BP_0025663 - BP_0025664)	6/27/23
978	Steven Grenadier Expert Report - Appendix A: Curriculum Vitae	Pre-admitted
979	Steven Grenadier - Expert Report - Updated Exhibit 1: Inflation and One Year U.S. Treasury Constant Maturity Rates 1960 - 4/20/202	Pre-admitted
993	Thomas S. Terry Expert Report - Appendix A: Curriculum Vita	Pre-admitted
994	Guenther paystubs (GUE 014448 - GUE 01499)	Pre-admitted
995	1988 ARP Amended Annual Report (BP_0026529 - BP_0026634)	Pre-admitted
996	1989 RAP Annual Report (BP_0024169 - BP_0024263)	Pre-admitted

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
999	Kwasha Lipton Analysis (BP_0027649 - BP_0027656)	Pre-admitted
1004	Fujimoto CB Fiche #1 (BP_0033188 - BP_0033242)	Pre-admitted
1005	Fujimoto CB Fiche #2 (BP_0033161 - BP_003318)	Pre-admitted
1006	Guenther CB Fiche (BP_0033107 - BP_0033155)	Pre-admitted
1007	Owen CB Fiche (BP_0033059 - BP_0033106)	Pre-admitted
1008	Defined Benefit Calculation Detail Worksheet –Fujimoto (BP_0031415 - BP_0031429)	Pre-admitted
1009	Qual RET Forms –Owen (BP_0033031 - BP_0033038)	Pre-admitted
1017	BP Letter: Notification of Interest Rate in 1997 (BP_0028715)	Pre-admitted
1020	RAP Distribution Check (GUE 002667)	Pre-admitted
1021	Settlement Packet to S. Fujimoto (GUE 002608 - GUE 002619)	Pre-admitted
1025	Cover Letter and Fujimoto Settlement Checks (GUE 002597 - GUE 002599)	Pre-admitted
1027	Fujimoto Pension Election Authorization (BP_0198268 - BP_0198276)	Pre-admitted
1036	Letter from W & S Fujimoto enclosing signed settlement agreements to BP (GUE 014217)	Pre-admitted
1037	Minutes of Regular Meeting of Board of Directors BP America Inc. (BP_0032899 - BP_0032901)	7/18/23
1044	Email from R. Dorazil to R. McCarthy re: Sohio Employees Retirement Program (BP_0029284)	7/14/23

TRIAL EX. #	DESCRIPTION	DATE ADMITTED
1045	Email from J. Durning to C. Chuang et al. re: Inequality in Retirement Plan Benefits for US Sohio Heritage Staff (BP_0029300 - BP0029303)	7/14/23
1046	Email from C. York to Guenther re: Heritage Sohio - review of opening account calculation (BP_0029371 - BP_0029373)	7/17/23
1047	Email from C. York to J. Heller re: Heritage Sohio - appeal how opening balance calculated (BP_0029398 - BP_0029401)	7/17/23
1050	Guenther Amended Interrogatory Response	6/27/23
1055	<i>Nichols v. BP</i> – Complaint	Admitted
1056	Settlement Agreement and Class Notice – <i>Nichols v. BP</i>	Admitted
1057	Order Granting Final Approval of Nichols Settlement	Admitted
1058	Report on Settlement Compliance – <i>Nichols v. BP</i>	Admitted
1060	BP Signed settlement agreement – W. Fujimoto	6/21/23
1061	BP Signed settlement S. Fujimoto	6/21/23
1072	Steven Grenadier – Curriculum Vita: April 2023	7/17/23
1073	Authorization of Group Vice President Human Resources, BP Amoco P.L.C.	7/18/23
1074	State of Indiana Office of Secretary of State Certified Copies	7/18/23
1075	Unanimous Written Consent in Lieu of Meeting of the Board of Directors of BP Amoco Corporation and BP America, Inc. Unanimous Written Consent to the Adoption of Resolution	7/20/23
1076	Thomas S. Terry – Professional Biography and Qualifications	7/18/23

Dated: August 30, 2023

Respectfully submitted,

By: /s/ Ian H. Morrison
Ian H. Morrison, Attorney in Charge:
Illinois State Bar No. 6231153
S.D. Texas Bar No. 1619213
imorrison@seyfarth.com

Monica Fitzgerald, Of Counsel
Texas State Bar No. 07088320
mafitzgerald@vorys.com

Steven R. Rech, Of Counsel
Texas State Bar No. 16649200
srech@vorys.com

Emma Mata, Of Counsel
Texas State Bar No. 24029470
emata@seyfarth.com

Thomas Horan, Of Counsel
Illinois State Bar No. 6324075
thoran@seyfarth.com

SEYFARTH SHAW LLP
233 South Wacker Drive, Suite 8000
Chicago, Illinois 60606
Telephone: (312) 460-5000
Facsimile: (312) 460-7000

700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340

VORYS, SATER, SEYMOUR & PEASE
909 Fannin, Suite 2700
Houston, TX 77010

*Attorneys for Defendants BP Retirement
Accumulation Plan and BP Corporation
North America Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I served this document on all counsel of record via ECF filing on
August 30, 2023, to:

Philip Randolph Meade
Peter Steilberg
Merrick Hofstedt and Lindsey PS
3101 Western Ave, Ste 200
Seattle, WA 98121
Email: pmeade@mhlseattle.com
psteilberg@mhlseattle.com

Leander L. James, IV
Susan Patricia Weeks
Brady Espeland
James Vernon and Weeks PA
1626 Lincoln Way
Coeur d'Alene, ID 83814
Email: ljames@jvwlaw.net
sweeks@jvwlaw.net
brady@jvwlaw.net

Jason W. Burge
Fishman Haygood, LLP
201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170-4600
Email: jburge@fishmanhaygood.com

/s/ Ian H. Morrison
Ian Morrison